

From: [Marroso, David](#)
To: [Robert C. Maysey](#)
Subject: UFC Subpoena
Date: Monday, February 27, 2017 10:12:56 AM

Rob,

I write to follow up on our conversation regarding the subpoenas your firm served on Top Rank and Bob Arum. As discussed, Top Rank and Mr. Arum believe the document subpoena is wildly overbroad. We will be objecting and, if necessary, will respond to any motion plaintiffs might file. We discussed trying to come up with a solution that would result in you obtaining "representative agreements" and an examination of Mr. Arum. I committed to discussing with Top Rank and Mr. Arum and seeing if such an accommodation could be reached. Here is what we are prepared to do:

1. Top Rank will produce a representative (not exhaustive) set of recent bout agreements for different fighters at (what you called) "different tiers." We anticipate somewhere between 6 and 12 such agreements.
2. The agreements will not be redacted.
3. Plaintiffs and defendant may examine Arum for total of 4 hours to be divided how they see fit (2/2, 3/1). Examination to be in Los Angeles on a date convenient for everyone.
4. Plaintiffs and defendant must agree that this production and deposition dispense with Top Rank's obligations in the case.

Please let me know if this is acceptable to plaintiffs.

David